

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

AUG 22 2022

UNITED STATES OF AMERICA

No. 3:22-cr-00282 DT
DEPUTY CLERK

v.) 18 U.S.C. § 371
[1] GLEN CASADA) 18 U.S.C. § 666(a)(1)(A)
[2] CADE COTHREN) 18 U.S.C. § 666(a)(1)(B)
) 18 U.S.C. § 666(a)(2)
) 18 U.S.C. § 1342
) 18 U.S.C. § 1956
) 18 U.S.C. § 1957
) 18 U.S.C. § 2
) 18 U.S.C. § 981

MOTION TO SEAL INDICTMENT

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Amanda J. Klopf, Assistant United States Attorney, hereby moves this Court to seal the indictment in this case.

Defendants Glen Casada and Cade Cothren, who are charged in the indictment returned today, are charged with: Conspiracy to commit Theft Concerning Programs Receiving Federal Funds, Bribery and Kickbacks Concerning Programs Receiving Federal Funds, and Honest Services Wire Fraud, in violation of Title 18, United States Code, Section 371; Theft Concerning Programs Receiving Federal Funds, in violation of Title 18, United States Code, Section 666(a)(1)(A), 2; Bribery and Kickbacks Concerning Programs Receiving Federal Funds, in violation of Title 18, United States Code, Section 666(a)(1)(B), 2 and 18 U.S.C. §§ 666(a)(2), 2; Honest Services Wire Fraud, in violation of Title 18, United States Code, Sections 1343, 1346; Use of a Fictitious Name to Carry Out A Fraud, in violation of Title 18, United States Code, Section 1342; Money Laundering Conspiracy, in violation of Title 18, United States Code, Section 1956(h); Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i),

2; Money Laundering, in violation of Title 18, United States Code, Section 18 U.S.C. §§ 1957, 2; and associated forfeiture.

The defendants are not in custody, and if the indictment is not sealed until such time as they are arrested, they will pose a flight risk.

WHEREFORE, for the above reasons, the United States respectfully requests the indictment be sealed as described in the attached proposed Order.

Dated: August 22, 2022

Respectfully submitted,

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Middle District of Tennessee

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